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SEDIMENTS

Subject:
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area Time-Critical Removal Action
Monthly Report (September 2009)

Date:
October 15, 2009

Dear Sam:

Contact:
Steve Garbaciak

Attached is the 3rd monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Paragraph 19a of the June 2009 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-09-C-925). On August 5, 2009, the United States Environmental Protection Agency determined that future updates on the Former Plainwell Impoundment TCRA project will be included in this monthly report. Per the August 6, 2009 direction of the United States Environmental Protection Agency, monthly reports will only be submitted electronically.

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If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS



Stephen Garbaciak Jr., P.E.
Vice President

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James Saric, USEPA
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**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
PLAINWELL NO. 2 DAM AREA TIME-CRITICAL REMOVAL ACTION**

REPORT #3, SEPTEMBER 2009

**PREPARED BY ARCADIS
OCTOBER 15, 2009**

ON BEHALF OF GEORGIA-PACIFIC LLC

SUBMITTED TO

**SAM BORRIES, ON-SCENE COORDINATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA**

REPORT #3, SEPTEMBER 2009

- On September 22, ARCADIS submitted to MDEQ a request to modify the discharge location for Outfall 3 as described in the SRD application.
- On September 23, ARCADIS received from USEPA written notification that all work associated with mobilization at the Plainwell No. 2 Dam Area TCRA has been completed in accordance with Paragraph 39 of the AOC.
- On September 28, ARCADIS submitted the 7th *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to USEPA and MDEQ.
- On September 28, ARCADIS received from MDNR details on construction specifications for the canoe portage to be installed near Removal Area 5A.
- On September 28, ARCADIS submitted to Weston (USEPA subcontractor) copies of waste manifests for disposal of material from the Plainwell No. 2 Dam Area TCRA.
- On September 29, ARCADIS received from Weston a copy of the analytical data for split sample PD2-092809-01-SD/TS20282.
- As of September 30, ARCADIS had received access to seven out of ten private properties (Table A).

Data Collected and Field Activities Conducted During the Period

- During the week of September 1, ARCADIS continued mobilization activities, continued land clearing, continued installation of the haul road along the Kalamazoo River, began construction of Staging Area 3, installed river closure buoys at the left diversion structure and in the mill race, and installed a river closure sign at Kayaker's Landing on 10th Street in Plainwell. Aggregate material from the remaining haul roads at the Former Plainwell Impoundment TCRA was removed and transported for reuse at the Plainwell No. 2 Dam Area TCRA project.
- During the week of September 7, ARCADIS continued mobilization activities, continued land clearing, continued installation of the haul road along the Kalamazoo River, and continued construction of Staging Area 3. Aggregate material from the remaining haul roads at the Former Plainwell Impoundment TCRA was removed and transported for reuse at the Plainwell No. 2 Dam Area TCRA project. Two fill samples (TS10042 and TS10043) were collected from sources of 6A aggregate material and crushed concrete, respectively. The samples were submitted for diesel range organics (DROs), gasoline range organics (GROs), target compound list (TCL) volatile organic compounds

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(VOCs), TCL semi-volatile organic compounds (SVOCs), PCBs, TCL pesticides, total organic carbon (TOC) and Resource Conservation and Recovery Act (RCRA) metal analysis. Four pre-construction soil samples (TS10044 through TS10047) were collected at 200-foot intervals from the haul road located along the Kalamazoo River in Removal Area 1. Table B summarizes the samples collected.

- During the week of September 14, ARCADIS continued mobilization activities, continued land clearing, continued installation of the haul road along the Kalamazoo River, began installation of resuspension controls and turbidity monitoring locations in Removal Area 1, and continued construction of Staging Area 3. Aggregate material from the remaining haul roads at the Former Plainwell Impoundment TCRA was removed and transported for use at the Plainwell No. 2 Dam Area TCRA project.
- During the week of September 21, ARCADIS continued installation of the haul road along the Kalamazoo River, continued installation of resuspension controls and turbidity monitoring locations in Removal Area 1, began excavation activities in Removal Area 1, installed temporary access to Island 1, and completed excavation activities at Island 1. Ten confirmation samples (TS20273 and TS20275 through TS20283) and one duplicate sample (TS20274) were collected from Removal Area 1 and Island 1 and submitted for PCB analysis. USEPA collected a split sample of TS20282 (PD2-092809-01-SD/TS20282). Two surface water samples (TS30132 and TS30133) were collected from the downstream and upstream, respectively, turbidity monitoring locations near Removal Area 1. A rinse blank (TS30134) was also collected. One PCB wipe sample (092309-Vac Truck-Carbon) was collected from the vacuum truck used to remove spent carbon from the water treatment system. Table B summarizes the samples collected. Processed material from the staging area was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.
- During the week of September 28, ARCADIS continued installation of the haul road along the Kalamazoo River, began installation of resuspension controls and turbidity monitoring locations in Removal Area 2, continued excavation activities in Removal Area 1, and began excavation activities in Removal Area 2. Seven confirmation samples (TS20284 through TS20290) were collected from Removal Areas 1 and 2 and submitted for PCB analysis. Table B summarizes the samples collected. Processed material from the staging area was loaded into trucks and transported to the Ottawa County Farms Landfill in Coopersville, Michigan or the C&C Landfill in Marshall, Michigan for disposal.
- As of September 30, approximately 1,260 cubic yards of material had been excavated from Removal Areas 1 and 2 and Island 1.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
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Plainwell No. 2 Dam Area TCRA**

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Laboratory Data Received During the Period

- During the week of September 1, ARCADIS received analytical data for pre-construction soil samples TS10038 through TS10041 (collected in August).
- No analytical data was received during the weeks of September 7 and 14.
- During the week of September 21, ARCADIS received analytical data for aggregate samples TS10042 and TS10043 (DRO and GRO only); confirmation sample TS20277; pre-construction soil samples TS10044 through TS10047; and PCB wipe sample 092309-Vac Truck-Carbon.
- During the week of September 28, ARCADIS received analytical data for confirmation samples TS20273 through TS20276, TS20282, and TS20283; and USEPA split sample PD2-092809-01-SD/TS20282.
- ARCADIS is awaiting analytical data for confirmation samples TS20278 through TS20281, TS20284 through TS20290; aggregate samples TS10042 and TS10043 (PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL pesticides); and surface water samples TS10045 through TS10047.

Issues Encountered and Actions Taken

- The owner of the McMurtrie property verbally confirmed that he would not sign the access agreement if the proposed location of Staging Area 2 was not altered because he is concerned it will interfere with daily activities on his property, which is currently utilized as a horse training facility. The proposed location for Staging Area 2 is located on the Simons' property adjacent to the McMurtrie property. The owner of the Simons property does not wish to alter the location of Staging Area 2. ARCADIS will continue to discuss property access with the McMurtrie property owner throughout October (Table A).
- The owners of the Simons property have verbally accepted the locations of staging areas and access roads located on their properties. ARCADIS and Georgia-Pacific are negotiating a compensation package with the owner of the Simons property for access to their properties. Georgia-Pacific is attempting to meet with the owners of the Simons property in October to discuss property access (Table A).

**Monthly Report for the Allied Paper, Inc./Portage Creek/
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Plainwell No. 2 Dam Area TCRA**

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Developments Anticipated During the Next Reporting Period

- During the week of October 1, ARCADIS is scheduled to receive a draft SRD from MDEQ, receive an executed property access agreement from Consumers Energy, complete excavation activities in Removal Area 1, continue excavation activities Removal Area 2, continue installation of resuspension controls at Removal Area 2, and continue loading and transporting processed material to the appropriate landfill.
- During the week of October 5, ARCADIS is scheduled to receive a final SRD from MDEQ, complete excavation activities in Removal Area 2, remove re-suspension controls from Removal Area 1, remove the temporary access to Island 1, begin restoration activities in Removal Area 1, install resuspension controls in Removal Area 3A, begin excavation activities in Removal Area 3A, improve the railroad crossing near Staging Area 3, begin discharge of treated wastewater from Staging Area 3, and continue loading and transporting processed material to the appropriate landfill.
- During the week of October 12, ARCADIS is scheduled to remove resuspension controls from Removal Area 2, complete restoration activities in Removal Area 1, begin restoration activities in Removal Area 2, continue excavation activities in Removal Area 3A, improve the railroad crossing near Staging Area 3, and continue loading and transporting processed material to the appropriate landfill.
- During the week of October 19, ARCADIS is scheduled to complete restoration activities in Removal Area 2, complete excavation activities in Removal Area 3A, install resuspension controls in Removal Area 4A, begin excavation activities in Removal Area 4A, host the monthly Stakeholder's Meeting, and continue loading and transporting processed material to the appropriate landfill.
- During the week of October 26, ARCADIS is scheduled to remove resuspension controls in Removal Area 3A, begin restoration activities in Removal Area 3A, complete excavation activities in Removal Area 4A, and continue loading and transporting processed material to the appropriate landfill.
- In October, ARCADIS will continue submitting Weekly Construction Reports for the Plainwell No. 2 Dam Area TCRA to USEPA.
- In October, ARCADIS will begin submitting copies of analytical data from Plainwell No. 2 Dam Area TCRA sampling activities to USEPA.

**Monthly Report for the Allied Paper, Inc./Portage Creek/
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Updates to the Former Plainwell Impoundment TCRA

- During the weeks of September 1, 7, and 14, aggregate material from the remaining haul roads at the Former Plainwell Impoundment TCRA was removed for re-use at the Plainwell No. 2 Dam Area TCRA. The top 6 inches of the haul roads were removed and disposed off-site at the conclusion of the Former Plainwell Impoundment TCRA. The underlying material is being re-used. Geotextile fabric used as base for the haul roads was transported to an offsite commercial landfill for disposal.
- During the weeks of September 14 and 21, a fence was installed to prevent vehicular access to the Plainwell Dam as discussed and coordinated with the MDNR.
- On September 15, ARCADIS submitted to USEPA, MDNR, MDEQ, USFWS, and National Oceanic Atmospheric Administration (NOAA) a draft technical memo regarding the recommended approach for addressing the bank stabilization issues in Removal Areas 8 and 9B.

Developments Anticipated During the Next Reporting Period from the Former Plainwell Impoundment TCRA

- In October, ARCADIS is scheduled to receive approval from USEPA on the recommended approach for addressing the bank stabilization issues in Removal Area 8 and 9B, and begin construction of the bank stabilization.
- ARCADIS awaits approval from USEPA of the Construction Completion report submitted in August 2009.

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Significant Developments and Activities During the Period

- On September 1, ARCADIS submitted the 3rd *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to United States Environmental Protection Agency (USEPA) and Michigan Department of Environmental Quality (MDEQ).
- On September 3, ARCADIS submitted to USEPA copies of the revised signed and sealed final design contract drawings G-1.1, SR-1.2, SR-1.4, R-1.5, and R-2.1.
- On September 10, ARCADIS submitted the 4th *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to USEPA and MDEQ.
- On September 10, 21, 25, and 28, ARCADIS and MDEQ discussed the status of the Substantive Requirements Document (SRD) for discharge of treated water at the Plainwell No. 2 Dam Area TCRA.
- On September 11, ARCADIS submitted to USEPA aerial photographs of the Plainwell No. 2 Dam Area.
- On September 15, ARCADIS submitted to USEPA the 2nd *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area TCRA* for August 2009.
- On September 16, ARCADIS and Georgia-Pacific hosted the monthly Stakeholder's Meeting. Representatives from USEPA, Michigan Department of Natural Resources (MDNR), and United States Fish and Wildlife Services (USFWS) attended the meeting.
- On September 16, ARCADIS and MDNR met to discuss a canoe portage to be installed near the downstream end of Removal Area 5A.
- On September 18, ARCADIS submitted the 5th and 6th *Weekly Construction Update for the Plainwell No. 2 Dam Area TCRA* to USEPA and MDEQ.
- On September 18, ARCADIS received notification from Georgia-Pacific LLC assigning ARCADIS as a designated agent for signing Plainwell No. 2 Dam Area TCRA waste manifests.

Georgia-Pacific, LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA
Monthly Report #3, September 2009

Table A — Summary of Property Access Agreements (as of September 30, 2009)

| Date Sent | Property Owner | Pacel Number | Status |
|------------------|---------------------------|---|---|
| 6/10/2009 | Arcan Inc. | 08-032-010-00 | accepted (received 6/18/09) |
| 5/22/2009 | Consumers Energy | 08-032-015-00 | signed license agreement submitted to Consumers during the week of September 21, awaiting executed copy for Consumers |
| 7/31/2009 | Diana Steele Thompson | 08-032-005-10 | accepted (received 8/4/09) |
| 5/22/2009 | Edward and Ronald Hodgman | 08-032-027-00 | accepted (received 6/3/09) |
| 5/22/2009 | Edward Mc Murtrie | 08-032-042-00 | rejected initial agreement |
| 5/22/2009 | Howe Aluminum Products | 08-032-028-00 | accepted (received 6/3/09) |
| 7/31/2009 | MDNR | 08-032-041-00 08-032-040-00 | accepted (received 8/7/09) |
| 5/22/2009 | Michelle and Paul Simons | 08-032-034-10 08-032-039-00 08-032-006-00 | in negotiations |
| 7/29/2009 | Steele Trust | 08-033-012-00 08-033-009-00 08-033-018-00 | accepted (received 8/3/09) |
| 8/4/2009 | Ray Hendricksma | 08-032-033-00 | accepted (received 8/7/09) |
| | Terry Winkle | | accepted (received 8/10/09) |

Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
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Table B — Summary of Samples Collected and Data Received in September 2009

| Sample ID | Sample Date | Data Received | Sample Delivery Group | Laboratory | Sample Location | Analysis Conducted | PCB Result | PCB Action Limit | Response Action |
|-----------------------------------|-----------------|-----------------|-----------------------|-------------------------------|-------------------------|--------------------|--------------------|------------------|-----------------|
| Confirmation Samples | | | | | | | | | |
| TS20273 [TS20274] | 09/23/09 | 09/28/09 | 093744 | KAR Labs | RA 1, Grid 1 | PCBs | 0.33 mg/kg U | 5 mg/kg | None |
| TS20275 | | | | | RA 1, Grid 2 | PCBs | 0.33 mg/kg U | 5 mg/kg | None |
| TS20276 | | | | | RA 1, Grid 3 | PCBs | 1.8 mg/kg | 5 mg/kg | None |
| TS20277 | | | | | RA 1, Grid 4 | PCBs | 2.1 mg/kg | 5 mg/kg | None |
| TS20278 | 09/24/09 | 09/24/09 | 093741 | KAR Labs | RA 1, Grid 5 | PCBs | 1.9 mg/kg | 5 mg/kg | None |
| TS20279 | | | | | RA 1, Grid 6 | PCBs | - | - | - |
| TS20280 | | | | | RA 1, Grid 7 | PCBs | - | - | - |
| TS20281 | | | | | RA 1, Grid 8 | PCBs | - | - | - |
| TS20282 ¹ | 09/25/09 | 09/28/09 | 093779 | KAR Labs | Island 1, Grid 1 | PCBs | 1.9 mg/kg | 5 mg/kg | None |
| PD2-092809-01-SD / TS20282 | 09/25/09 | 09/29/09 | 0909525 | TriMatrix Laboratories | Island 1, Grid 1 | PCBs | 0.5 mg/kg J | 5 mg/kg | None |
| TS20283 | 09/25/09 | 09/28/09 | 093779 | KAR Labs | Island 1, Grid 2 | PCBs | 1.6 mg/kg | 5 mg/kg | None |
| TS20284 | 09/29/09 | NR | NR | KAR Labs | RA 1, Grid 9 | PCBs | - | - | - |
| TS20285 | | | | | RA 1, Grid 10 | PCBs | - | - | - |
| TS20286 | | | | | RA 1, Grid 11 | PCBs | - | - | - |
| TS20287 | | | | | RA 1, Grid 12 | PCBs | - | - | - |
| TS20288 | 09/30/09 | NR | NR | KAR Labs | RA 2, Grid 1 | PCBs | - | - | - |
| TS20289 | | | | | RA 2, Grid 2 | PCBs | - | - | - |
| TS20290 | | | | | RA 2, Grid 3 | PCBs | - | - | - |

Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Plainwell No. 2 Dam Area TCRA
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Table B — Summary of Samples Collected and Data Received in September 2009

| Sample ID | Sample Date | Data Received | Sample Delivery Group | Laboratory | Sample Location | Analysis Conducted | PCB Result | PCB Action Limit | Response Action |
|-------------------------------|-------------|-----------------------------|---------------------------|------------------|--|---|----------------------------------|--|----------------------|
| Fill Material Sampling | | | | | | | | | |
| TS10042 | 09/08/09 | 09/22/09 (KAR) and NR (TAL) | 093507 (KAR) and NR (TAL) | KAR Labs and TAL | 9-part composite sample from 6A aggregate material | PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL Pesticides (TAL) DROs and GROs, (KAR) | NR | 4 mg/kg | None ^{2, 3} |
| TS10043 | 09/08/09 | 09/22/09 (KAR) and NR (TAL) | 093507 (KAR) and NR (TAL) | KAR Labs and TAL | 9-part composite sample from crushed concrete material | PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, and TCL Pesticides (TAL) DROs and GROs, (KAR) | NR | 4 mg/kg | None ^{2, 3} |
| PCB Wipe Sample | | | | | | | | | |
| 092309-Vac Truck-Carbon | 09/23/09 | 09/24/09 | 093740 | KAR Labs | Wipe samples from vacuum truck used to remove carbon from the water treatment system | PCBs | 0.1 µg per 100 cm ² U | 10 µg per 100 cm ² ⁴ | None |
| Pre-Construction Soil Samples | | | | | | | | | |
| TS10038 | 08/19/09 | 09/04/09 | 093349 | KAR Labs | Haul road from SA3 to Kalamazoo River | PCBs | 0.33 mg/kg U | - | - |
| TS10039 | | | | | Haul road from SA3 to Kalamazoo River | PCBs | 0.33 mg/kg U | - | - |
| TS10040 | 08/25/09 | | | | Haul road from SA3 to Kalamazoo River | PCBs | 0.33 mg/kg U | - | - |
| TS10041 | | | | | Haul road from SA3 to Kalamazoo River | PCBs | 0.33 mg/kg U | - | - |
| TS10044 | 09/10/09 | 09/22/09 | 093544 | KAR Labs | Haul road along RA 1 | PCBs | 0.33 mg/kg U | - | - |
| TS10045 | | | | | Haul road along RA 1 | PCBs | 0.33 mg/kg U | - | - |
| TS10046 | | | | | Haul road along RA 1 | PCBs | 0.33 mg/kg | - | - |
| TS10047 | | | | | Haul road along RA 1 | PCBs | 0.4 mg/kg | - | - |
| Surface Water Samples | | | | | | | | | |
| TS30132 | 09/24/09 | NR | NR | TAL | 300' downstream RA 1 | PCBs | - | - | - |
| TS30133 | | | | | 200' upstream of RA 1 | PCBs | - | - | - |
| TS30134 | | | | | Rinse Blank | PCBs | - | - | - |

Notes:

- 1 - Split of the sample collected by USEPA.
2 - Analytical results compared to applicable Part 201 cleanup criteria and Part 213 RBSLs provided in MDEQ's RRD Operational Memorandum No. 1 (Table 2, Column #19, Direct Contact Criteria & RBSLs).
3 - Analytica data has only been received for DROs and GROs.
4 - The decontamination standard for non-porous materials previously in contact with PCB-containing liquid according to Federal Regulations (Title 40, Chapter 1, Subchapter R, Part 761.79.3).

* Duplicate samples are shown in brackets.

* Analytical results have not been validated.

DRO - diesel range organic

GRO - gasoline range organic

J - The compound was positively identified; however, the associated numerical value is an estimated concentration only.

MDEQ - Michigan Department of Environmental Quality

NR - not received

SVOCs - semivolatile organic compounds

TAL - TestAmerica Laboratories

TCL - target compound list

PCBs - polychlorinated biphenyls

RA - Removal Area

RBSL - Risk Based Screening Level

RCRA - Resource Conservation and Recovery Act

RRD - Remediation Redevelopment Division

SA - Staging Area

U - Compound analyzed but not detected at a concentration above the reporting limit

USEPA - United States Environmental Protection Agency

VOCs - volatile organic compounds

mg/kg - milligrams per kilogram